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November 1, 2005

Ms. Catherine W. Seidel
Acting Chief, Wireless Telecommunications Bureau
Federal Communications Commission
445 – 12th Street, S.W.
Washington, D.C. 20554

Ms. Kris Monteith
Chief, Enforcement Bureau
Federal Communications Commission
445 – 12th Street, S.W.
Washington, D.C. 20554

Re: Enhanced 911 Status Report

Dear Ms. Seidel and Ms. Monteith:

Verizon Wireless hereby submits its quarterly status report documenting the progress of its efforts to deploy Enhanced 911 ("E911") capabilities, as required by the Commission's *Order* granting Verizon Wireless a waiver from certain Phase II E911 obligations.¹ There have been no additional deployment benchmarks that Verizon Wireless was required to meet since its last quarterly report. Should you need additional information, please contact the undersigned.

Sincerely,

A handwritten signature in black ink that reads "John T. Scott, III". The signature is written in a cursive, slightly stylized font.

John T. Scott, III

¹ *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, Request for Waiver by Verizon Wireless, CC Docket No. 94-102 ("Order"), 16 FCC Rcd. 18634 (2001).

E911 Status - Quarterly Report – November 1, 2005

SUMMARY

Verizon Wireless has successfully implemented extensive network components, purchased modified handsets, and completed a complex series of tasks associated with providing enhanced 911 Phase I and Phase II location services to the public. Verizon Wireless' efforts to deploy enhanced 911 location services are summarized as follows:

- Verizon Wireless can support E911 Phase II service requests in markets supported by all three of its switch vendors.
 - Verizon Wireless met its milestones for completing deployment of the network-assisted portion of AGPS/AFLT in Lucent and Nortel markets by April 1, 2002 and August 1, 2002 respectively.
 - Verizon Wireless completed deployment of the network-assisted portion of AGPS/AFLT in its Motorola markets by March 1, 2003.
 - As of October 15, 2005, Verizon Wireless now provides Phase I E911 service to a total of 3,011 PSAPs serving an estimated population of 206 million residents in parts or all of 48 States.
 - Verizon Wireless now provides Phase II E911 service to 2,075 PSAPs serving an estimated population of 169 million residents in parts or all of 44 states.
 - Verizon Wireless has also deployed an interim EFLT solution in its Lucent and Nortel-switched markets that is activated commensurate with the activation of Phase II E911 AGPS/AFLT service to individual PSAPs.
- As of December 31, 2003 all of the handset models Verizon Wireless sells are GPS-capable of transmitting location.
 - Recent changes in GPS-capable handset penetration trends have led Verizon Wireless to conclude that although it will come close to the 95% penetration level, it expects more than 93% of its customers to use GPS-capable handsets by year-end, just short of the Commission's target. Verizon Wireless has filed a Request for a Limited Waiver² to allow it an additional six months to meet that milestone and will continue to keep the Commission informed regarding its progress over the coming months.

² Request for Waiver of GPS Handset Penetration Rule by Verizon Wireless, filed October 17, 2005, WT Docket No. 05-301

I. HANDSET DEPLOYMENT

The *Order* required Verizon Wireless to begin selling and activating AGPS/AFLT capable handsets no later than December 31, 2001. Verizon Wireless met that requirement and other handset benchmarks:

- The *Order* established certain handset sales and activation milestones, requiring that at least 25% of all new handsets sold and activated between July 31, 2002 and March 30, 2003 were to be AGPS/AFLT capable. Verizon Wireless exceeded that requirement; 34% of its new handsets activated during that period were AGPS/AFLT capable.
- The *Order* required that at least 50% of all new handsets sold and activated between March 31, 2003 and December 30, 2003 were to be AGPS/AFLT capable. Verizon Wireless exceeded the 50% deployment milestone; 78% of its new handsets activated during the period were AGPS/AFLT capable.
- The *Order* required that beginning December 31, 2003, 100% of all new handsets sold and activated were to be AGPS/AFLT capable. Starting November 2001, Verizon Wireless required the AGPS/AFLT capability in all new handset models it ordered from manufacturers. As a result, by December 31, 2003, 100% of all the new handsets Verizon Wireless offered for sale via its direct distribution channels (company-owned stores and personnel, telemarketing and web-based sales channels) were AGPS/AFLT-capable.
- Verizon Wireless also instituted multiple requirements and procedures intended to ensure that its indirect distribution channels (those authorized agents and retailers who purchase and sell their own handsets and activate service on Verizon Wireless' behalf) offered only GPS-capable handsets by December 31, 2003.
- All of Verizon Wireless' handsets are GPS-capable: Samsung models SCH-N330, SCH-A630, SCH-A650, SCH-A650PPD, SCH-A670, SCH-I730, SCH-A790, SCH-A890, SCH-A970, SPH-I700 and SCH I600; Audiovox models CDM8600, CDM8615ppd, CDM8910, CDM8940, XV6600 and XV6600WOC; LG models VX3300, VX4650, VX5200, VX4700, VX6100, VX6100PPD, VX7000, VX8000, VX8100 and VX9800; Motorola models A840, A850, E815, T300P, V60p, V65p, V276 and V710; Kyocera models SE47, KX414, KX444, KX1 and KX2; RIM Blackberry 6750, 7250 and 7750; Nokia model 2128iPPD, 6015i, 6015iPPD and TREO 600 and TREO 650.
- Verizon Wireless has requested a limited waiver³ to allow it an additional six months to meet the Commission's 95% GPS handset penetration milestone. Presently 91% of Verizon Wireless' customers have GPS-capable handsets and we expect to reach 93% penetration by year-end, just short of the Commission's target.

³ Request for Waiver of GPS Handset Penetration Rule by Verizon Wireless, filed October 17, 2005, WT Docket No. 05-301

II. PHASE I & II PSAP DEPLOYMENT STATUS CHARTS

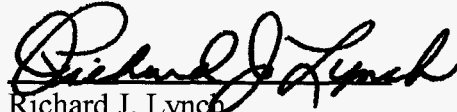
As part of this status update regarding Verizon Wireless' Phase II compliance efforts, the FCC requested information regarding all pending Phase I and Phase II requests. The FCC required carriers to utilize a uniform reporting format for listing pending and completed deployments in place of individual, carrier developed report formats. The attached charts provide the status of the progress of Phase I and Phase II requests as of October 15, 2005.

Below is a summary of Verizon Wireless's deployment activities:

- As of October 15, 2005 Verizon Wireless provides Phase I E911 service to a total of 3,011 PSAPs serving an estimated population of 206 million residents. Verizon Wireless provides live Phase I E911 service to PSAPs in parts or all of 48 states: AL, AR, AZ, CA, CO, CT, DC, DE, FL, GA, IA, ID, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MT, NC, ND, NE, NH, NJ, NM, NV, NY, OH, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV, and WY.
- Verizon Wireless also provides Phase II E911 service to a total of 2,075 PSAPs serving an estimated population of 169 million residents. Verizon Wireless provides live Phase II E911 service to PSAPs in parts or all of 44 states: AL, AZ, CA, CO, CT, DC, FL, GA, IA, ID, IL, IN, KS, KY, LA, MA, MD, ME, MI, MN, MO, MS, MT, NC, ND, NH, NJ, NV, NY, OH, OR, PA, RI, SC, SD, TN, TX, UT, VA, VT, WA, WI, WV and WY.

DECLARATION OF RICHARD J. LYNCH

I have read the foregoing E911 Quarterly Status Report. I declare under penalty of perjury that the foregoing is true and correct. Executed on oct 28, 2005.

A handwritten signature in black ink, appearing to read "Richard J. Lynch", written over a horizontal line.

Richard J. Lynch
Executive Vice President and
Chief Technical Officer
Verizon Wireless

Certificate of Service

I hereby certify that on this 1st day of November 2005 copies of the foregoing E911 Quarterly Status Report in CC Docket 94-102 were sent by first-class mail to the following parties:

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